

**Testimony of the Connecticut Association of Directors of Health**  
*In Support of Raised Bill 830: An Act Prohibiting the Use of Certain Outdoor Wood-Burning Furnaces*  
To the Distinguished Co-Chairs and Members of the Environment Committee  
February 9, 2011

Good morning, distinguished Co-Chairs and Members of the Environment Committee. My name is Robert Miller, and I am on the Executive Committee of the Connecticut Association of Directors of Health, or "CADH," and Director of the Eastern Highlands Health District, serving the towns of Andover, Ashford, Bolton, Chaplin, Columbia, Coventry, Mansfield, Scotland, Tolland, and Willington.

CADH supports *Raised Bill 830: An Act Prohibiting the Use of Certain Outdoor Wood-Burning Furnaces* ("OWBs"). The scientific literature concludes that volatile organic compounds and small particulate matter, such as wood smoke, endanger the health of those exposed. Potential adverse health outcomes from exposure include increased coughing and difficulty breathing; decreased lung function; aggravated asthma; development of chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease.<sup>1</sup>

Smoke generated by OWBs is uniquely harmful, relative to smoke generated by other wood-burning activities. The basic design of OWBs causes fuel to burn incompletely, often resulting in thick smoke and high particulate emissions. Moreover, unlike other wood-burning activities, OWBs burn continuously, further elevating the extent of particulate emissions. In short, wood smoke from OWBs presents a significant public health threat.

Currently, local health departments are regularly asked to investigate complaints from residents adversely affected by wood smoke. Even units that meet the separating distance and stack height requirements under current law<sup>2</sup> are included among these reports. The current requirements are not only insufficient to protect the public's health from OWB emissions but also challenge the resources of local public health departments, which must investigate every complaint.

Though CADH supports the ban proposed in *Raised Bill 830*, there are some concerns with respect to the language as written:

- The Public Health Committee ought to consider amending the language to eliminate the exception for purposes of agriculture or farming or providing heat to the home of any person engaged in agriculture or farming ("Farming Exception"); the risks to the public are the same, irrespective of the category of user or use.
- If the Farming Exception is retained, at a minimum, the bill language should include some assurance that such persons be subject to the existing requirements for OWBs under Section 22a-174k(b) of the Connecticut General Statutes.
- The definitions of "agriculture" and "farming" as described in Section 1-1(q) of the Connecticut General Statutes may be overly broad for purposes of creating an exception to the proposed ban on OWBs.
- The Public Health Committee ought to consider deleting "or solid waste" from the definition of OWBs under Section 22a-174k(a) of the Connecticut General Statutes; only the burning of clean wood is appropriate.

Connecticut law currently does not regulate particulate matter emission levels for OWBs. Until such time that the Department of Environmental Protection may establish emissions standards that adequately protect the public's health and that OWB technology has evolved to meet those standards, CADH supports *Raised Bill 830* to prohibit the use of certain OWBs, subject to the concerns outlined above.

CADH is a nonprofit organization comprised of Connecticut's 77 local health departments and districts. Since its incorporation in 1996, CADH has and continues to convene, engage, mobilize, and support Connecticut's local health departments and districts to strengthen and assure efficient and effective delivery of public health services. Local health directors are the statutory agents of the Commissioner of Public Health and are critical providers of essential public health services at the local level in Connecticut. Thank you for your consideration.

<sup>1</sup> Environmental Protection Agency. *Health Effects of Breathing Woodsmoke*. Available at [http://www.epa.gov/burnwise/pdfs/woodsmoke\\_health\\_effects\\_jan07.pdf](http://www.epa.gov/burnwise/pdfs/woodsmoke_health_effects_jan07.pdf). Accessed December 28, 2010.

<sup>2</sup> Conn. Gen. Stat. Section 22a-174k(b).